



1345 AVENUE OF THE AMERICAS – 11TH FLOOR
NEW YORK, NEW YORK 10105
TELEPHONE: (212) 370-1300
FACSIMILE: (212) 370-7889
www.egsllp.com

August 29, 2019

VIA ECF

Hon. Arthur D. Spatt
United States District Court Judge
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722-9014

Re: ***Esposito v. Suffolk Co. Community College, et al.***
16-cv-4833 (ADS) (ARL)

Dear Judge Spatt:

This firm currently represents plaintiff Frances Esposito (“Plaintiff”) in the above-referenced matter. On August 23, 2019, counsel for defendants filed a motion seeking attorneys’ fees and costs pursuant to Your Honor’s Order dated July 26, 2019 (the “Fee Motion”). Per EDNY Local Rule 6.1(b), Plaintiff’s response to that motion is due to be filed on September 6, 2019.

However, on August 28, 2019, this firm filed a motion to withdraw as counsel for Plaintiff (the “Withdrawal Motion”). *ECF Dkt. Nos. 74-76*. In light of that motion, we write with the consent of counsel for Defendants to respectfully request that Plaintiff’s time to oppose the Fee Motion be extended until 60 days after the Withdrawal Motion is decided by Your Honor should that motion be granted in order to allow Plaintiff sufficient time to find new counsel and have that counsel prepare any such opposition, or, should the court decline to grant the Withdrawal Motion, 14 days after such decision.

Based on the extenuating circumstances detailed in the Withdrawal Motion, Plaintiff respectfully requests that the Court approve the instant request.

Very truly yours,

ELLENOFF GROSSMAN & SCHOLE LLP

A handwritten signature in black ink, appearing to read "Valerie J. Bluth".

Valerie J. Bluth